

**REMARKS**

Claims 1-8, 10, 12-19, 21 and 23-27 are pending in this application. By this Amendment, claims 1, 7 and 17 are amended. Reconsideration of the application is respectfully requested.

Entry of the amendments is proper under 37 CFR §1.116 since the amendments: (a) place the application in condition for allowance (for the reasons discussed herein); (b) do not raise any new issue requiring further search and/or consideration (since the amendments amplify issues previously discussed throughout prosecution); (c) place the application in better form for appeal, should an appeal be necessary. The amendments are necessary and were not earlier presented because they are made in response to arguments raised in the final rejection. Entry of the amendments is thus respectfully requested.

The Office Action rejects claims 1 and 3-6 under 35 U.S.C. §103(a) over Kumpf (U.S. Patent No. 6,581,098) in view of Leiman et al. (U.S. Patent No. 6,469,796); claim 2 under 35 U.S.C. §103(a) over Kumpf in view of Leiman and further in view of Beach et al. (U.S. Patent No. 6,404,772); claims 7, 8, 10, 12, 13, 17-19, 21, 23 and 24 under 35 U.S.C. §103(a) over Levine (U.S. Patent No. 6,020,973) in view of Beach and further in view of Buckley (U.S. Patent No. 6,542,173); claims 16 and 27 under 35 U.S.C. §103(a) over Levine in view of Beach, further in view of Buckley and further in view of Leiman; claims 14 and 25 under 35 U.S.C. §103(a) over Levine in view of Beach, in view of Buckley and further in view of Kurachi (U.S. Patent No. 6,181,436); and claims 15 and 26 under 35 U.S.C. §103(a) over Levine in view of Beach, in further view of Buckley and in further view of Mori (U.S. Patent No. 6,089,765). The rejections are respectfully traversed.

In particular, none of the applied references, alone or in combination, disclose, suggest or render obvious an image input and output control apparatus that includes a data conversion section that converts first format data stored in a storage section into second format data, and

that stores the converted data back in the storage section, as recited in independent claims 1, 7 and 17.

Support for this feature can be found in the specification at, for example, page 12, lines 7-9.

Beach teaches a wireless local area network that carries a mixed traffic of voice and data communications (Abstract).

Leiman teaches a method for open systems printing including routing printing jobs automatically from different types of source computers to different types of printers (Abstract).

Kawai teaches a data output apparatus that includes a storage device, a first receiving device, and storing the received parameters set into the first storage area (Abstract).

Kurachi teaches a print managing system with client apparatuses for generating print data and sending the generated print data to a printing apparatus (Abstract).

Mori teaches a printing system in which print data created by an application program and transferred to a printer is stored and managed in a print storage data device (Abstract).

The Office Action alleges that Levine teaches a data converter that converts the received first format data into the second format data (Office Action, page 11, lines 8-11). However, the section of Levine relied on by the Office Action merely teaches that "the job is converted into a representation written in a phrase description language such as postscript." However, Levine does not teach "a conversion section" and furthermore does not teach a conversion section that converts first format data stored in the storage section into second format data, and then stores the converted data back in the storage section, as recited in independent claims 1, 7 and 17. Although Levine teaches that data is converted, Levine does not teach that a conversion section that takes data from the storage section and later stores the converted data into the same storage section. Moreover, all the other references fail to cure

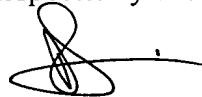
deficiencies in Levine in teaching a data conversion section that converts data stored in the storage section and stores the converted data in the storage section. Accordingly, any combination of the applied references would not result in the data conversion section as claimed in independent claims 1, 7 and 17.

Thus, because it would not have been obvious to combine the applied references to arrive at the claimed invention, independent claims 1, 7 and 17, and their dependent claims, are patentable over a combination of the applied references. As such, withdrawal of the rejections of the claims under 35 U.S.C. §103(a) is respectfully requested.

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-8, 10, 12-19, 21 and 23-27 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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